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Attorneys for JPMORGAN CHASE BANK, N.A.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON (SPOKANE/YAKIMA)

In re

RTK PRODUCERS, INC.,

Debtor(s).

Case No. 20-01798-FPC7

Chapter 7

NOTICE OF MOTION FOR RELIEF
FROM THE AUTOMATIC STAY

TO: RTK PRODUCERS, INC., the Debtor;
AND TO: DAVID A KAZEMBA, his attorney of record;
AND TO: MATTHEW J ANDERTON, Chapter 7 Trustee;
AND TO: ALL PARTIES IN INTEREST.

You and each of you should hereby take note that JPMorgan Chase Bank, N.A., Movant in the above-captioned matter, has petitioned the court for an order terminating the automatic stay against certain real property of the estate so that JPMorgan Chase Bank, N.A. may enforce its state court foreclosure remedies against said property.

The motion relates to the following property in the possession of the bankruptcy estate: 2015 Chevrolet Silverado.

The collateral has a fair market value of approximately \$44,925.00. The encumbrances on the collateral are as follows: \$9,186.62.


1 Movant further seeks a waiver of the fourteen-day "Stay of Order" provided by
2 Rule 4001(a)(3) of the Federal Rules of Bankruptcy Procedure.

3 Any party objecting to the motion must file a written objection stating the grounds for the
4 objection. Any objection, to be effective, must be filed with the court not later than 17 days from the
5 service of this Notice, by sending the same to Ms. Beverly Benka, Clerk of the Court, U.S.
6 Bankruptcy Court, Eastern District of Washington, P.O. Box 2164, Spokane, Washington 99210, and
7 to Jesse A.P. Baker of Aldridge Pite, LLP, 4375 Jutland Drive, Suite 200; P.O. Box 17933, San
8 Diego, CA 92177-0933, as attorney for Movant. The date of service of this Notice is specified below
9 and in the Proof of Service which accompanies this Notice.

10 All persons should note that their failure to file an objection will result in the court entering
11 an order as stated above.

12 Dated: July 1, 2022

ALDRIDGE PITE, LLP



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